Exhibit 1

REQUEST FOR PRODUCTION NO. 4:

REQUEST: All Documents, Communications or Social Media Posts concerning Robinhood or this Action.

PLAINTIFFS' RESPONSE: Plaintiffs object to this Request to the extent it is not relevant to the parties' claims and defenses and is overbroad and not proportional to the needs of the case because it is not limited in time and to the extent the Request seeks all Documents, Communications, or Social Media Posts that do not concern the allegations in this case. Plaintiffs will withhold Documents, Communications, or Social Media Posts: (a) outside of the Relevant Time Period; or (b) that do not concern the allegations in this case. Plaintiffs further object that the Request is overbroad to the extent it seeks information protected by any privilege and/or the attorney work-product doctrine. Plaintiffs will produce responsive, non-privileged documents, if any exist, during the Relevant Time Period and that concern the allegations in this case. To the extent this Request seeks Social Media Posts that are in the public domain, they are equally available to Defendants; however, Plaintiffs will make a good faith effort to produce them after a reasonable search.

REQUEST FOR PRODUCTION NO. 11:

REQUEST: Documents sufficient to identify each of Your holdings, investments, and transactions in any securities other than the Relevant Securities during the Relevant Time Period.

PLAINTIFFS' RESPONSE: Plaintiffs object that this Request asks solely about securities *other than* the Relevant Securities, and accordingly is neither relevant to the parties' claims and defenses nor proportional to the needs of the case. Plaintiffs will withhold the requested Documents, if any exist.

REQUEST FOR PRODUCTION NO. 12:

REQUEST: Your federal and state income tax returns for the most recent three years, including tax returns for any businesses You own, limited to Internal Revenue Service Form 1040, U.S. Individual Income Tax Return and Schedules A, B, D and E and the IRS worksheets related to these schedules, or the equivalent for any other type of return.

PLAINTIFFS' RESPONSE: Plaintiffs object to this Request because Plaintiffs' federal and state income tax returns are neither relevant to the parties' claims and defenses in the case, nor proportional to the needs of the case because the Request is unduly burdensome and appears to be designed to harass. Moreover, Plaintiffs object to this Request to the extent that it is cumulative. As set forth above, Plaintiffs have agreed to produce documents sufficient to identify transactions in the Relevant Securities during the Relevant Time Period. Plaintiffs will not produce any tax returns in response to this Request.